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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

BRAND LITTLE and ROBIN BURNS,
 Individually and on Behalf of All Others Similarly
 Situated,

Plaintiffs,

v.

**PACIFIC SEAFOOD PROCUREMENT, LLC;
 PACIFIC SEAFOOD PROCESSING, LLC;
 PACIFIC SEAFOOD FLEET, LLC; PACIFIC
 SEAFOOD DISTRIBUTION, LLC; PACIFIC
 SEAFOOD USA, LLC; DULCICH, INC.;
 PACIFIC SEAFOOD – EUREKA, LLC;
 PACIFIC SEAFOOD – CHARLESTON, LLC;
 PACIFIC SEAFOOD – WARRENTON, LLC;
 PACIFIC SEAFOOD – NEWPORT, LLC;
 PACIFIC SEAFOOD – BROOKINGS, LLC;
 PACIFIC SEAFOOD – WESTPORT, LLC;
 PACIFIC SURIMI – NEWPORT LLC; BLUE
 RIVER SEAFOOD, INC.; SAFE COAST
 SEAFOODS, LLC; SAFE COAST SEAFOODS
 WASHINGTON, LLC; OCEAN GOLD
 SEAFOODS, INC.; NOR-CAL SEAFOOD,
 INC.; KEVIN LEE; AMERICAN SEAFOOD
 EXP, INC.; CALIFORNIA SHELLFISH
 COMPANY, INC.; ROBERT BUGATTO
 ENTERPRISES, INC.; ALASKA ICE
 SEAFOODS, INC.; LONG FISHERIES, INC.;
 CAITO FISHERIES, INC.; CAITO
 FISHERIES, LLC; SOUTHWIND FOODS,
 LLC; FISHERMEN’S CATCH, INC.;
 GLOBAL QUALITY FOODS, INC.; GLOBAL
 QUALITY SEAFOOD LLC; OCEAN KING**

Case No. 3:23-cv-01098-AGT

STIPULATION AND
~~**[PROPOSED]**~~ **ORDER RE:**
SUBPOENAED TELEPHONE
RECORDS

Judge: Honorable Alex G. Tse

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FISH INC.; BORNSTEIN SEAFOODS, INC.;
ASTORIA PACIFIC SEAFOODS, LLC; DA
YANG SEAFOOD INC.; GREAT OCEAN
SEAFOOD INC.; and DOES 32-60,

Defendants.

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WHEREAS, Plaintiffs Brand Little and Robin Burns (collectively, “Plaintiffs”) served subpoenas on AT&T and Verizon Wireless (the “Subpoenas”) that sought, *inter alia*, production of records concerning Nonparty Don Alber (“Alber”) and the phone number (206) 499-6988 (collectively the “Alber Phone Records”);

WHEREAS, Alber has voiced certain concerns regarding the production of the Alber Phone Records;

WHEREAS, AT&T and Verizon Wireless have represented that the production of in response to the Subpoenas will only include logs of voice calls or text messages, disclosing date, time, duration, and to/from phone numbers, but will not include the content of any communications, such as texts, voicemails, call recordings, internet traffic information, or emails (collectively, “Communications Contents”);

WHEREAS, Alber has represented that he ceased to be affiliated with any fish buyer after March 1, 2020;

WHEREAS, in light of such representations and the parties’ desire to resolve the matter in way that amicably and efficiently addresses Alber’s concerns; and

WHEREAS, the undersigned counsel for Plaintiffs attests that he was authorized to sign this stipulation on behalf of counsel for Alber,

Plaintiffs and Alber hereby stipulate, subject to approval by the Court:

1. AT&T and Verizon Wireless shall not produce any Alber Phone Records for communications that occurred after March 1, 2020;
2. The Alber Phone Records produced by AT&T and Verizon to Plaintiffs shall not be disclosed to anyone other than Stuart Gross, Ross Middlemiss, Ian Atkinson-Young, Alber’s counsel, and Alber, for thirty (30) days after their production to Plaintiffs (the “Review Period”);
3. During the Review Period, Alber may redact information concerning communications with persons wholly unrelated to the crab industry.
4. In the event that Alber wishes to make any such redactions, he shall provide to Plaintiffs, prior to the expiration of the Review Period, a redacted version of the

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records (the “Redacted Alber Phone Records”), a categorical log of redactions that indicates the phone number(s) associated with all redacted entries, along with a generic description of the counterparty to such redactions (e.g. “415-867-5309, doctor”) and a statement under oath affirming the accuracy of the log;

5. In the event that Alber exercises his rights under the foregoing paragraph 4 within thirty days, Plaintiffs shall be barred from disclosing to any party or using for any purpose the unredacted version of the Alber Phone Records and shall produce to the defendants in this case only the Redacted Alber Phone Records, absent further order by this Court;
6. If Alber fails to exercise his rights under the foregoing paragraph 4 before the expiration of the Review Period, Plaintiffs may use the Alber Phone Records without restriction;
7. Irrespective of his decision to exercise or not exercise his rights under the foregoing paragraph 4, Alber is entitled to designate information in the Alber Phone Records and/or the Redacted Alber Phone Records either Confidential or Highly Confidential pursuant to the existing protective order, Dkt. No. 63;
8. Alber reserve any rights to seek attorneys’ fees and costs, as allowed by law, including any right to move for such attorneys’ fees and costs incurred in response to Plaintiffs subpoenas to AT&T and Verizon for his cell phone records;
9. And Plaintiffs reserves all rights, arguments, and defenses concerning any such request for attorneys’ fees or cost by Alber.

Dated: October 30, 2025

/s/ Stuart G. Gross

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Counsel for Plaintiffs and the Proposed Class

Dated: October 29, 2025

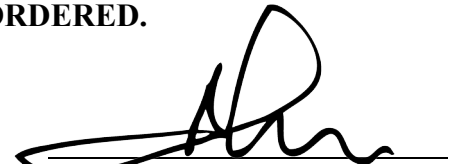
/s/ Stephen Kent Rose

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Counsel for Nonparty Don Alber

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: November 10, 2025



Hon. Alex G. Tse
United States Magistrate Judge